

Valdez, Heather

From: Pavitt, John
Sent: Wednesday, February 18, 2015 11:44 AM
To: Hedgpeth, Zach
Cc: Valdez, Heather
Subject: CISWI Subpart CCCC 10 Hour Test Run Results

Categories: Pogo FOIA

Just a heads up that we will be getting a request from ADEC to comment on source test results at Pogo Mine for their new incinerator.

Their source test report apparently shows the results of a 10 –run testing event, with all 10 runs averaged together to show compliance. However, within that testing event, the facility had a consecutive series of 3 test runs that when averaged together show an emission violation for one or more pollutants.

Q: Is it acceptable to conduct additional test runs (more than 3) and average the results together?

Suggested Response: This appears unacceptable and may circumvent the federal air rule. Table 1 of Subpart CCCC states that emission results for pollutants (other than CO) are to be represented by a “3 run average.” Since there are 3 consecutive runs, which when averaged together show emissions higher than allowed, that is credible evidence of an emission violation.

Do you think we should check in with the Emission Measurement Center for this question?

Thanks,

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